

**IN THE UNITED STATE BANKRUPTCY COURT
DISTRICT OF NEBRASKA**

IN RE:)	CASE NO. 24-40267-BSK
)	
ALDEN H. ZUHLKE and)	
LISA A. ZUHLKE,)	
)	
DEBTORS)	UNOPPOSED MOTION FOR
)	EXTENSION OF ANSWER
<u>PHILIP M. KELLY, CHAPTER 7,</u>)	DEADLINE
<u>TRUSTEE</u>)	
)	
Plaintiff)	ADV. PROC. NO. 24-4011-BSK
)	
vs.)	
)	
ALDEN H. ZUHLKE, LISA A.)	
ZUHLKE, DEREK A. ZUHLKE)	
KIMBERLY A. ZUHLKE, DILLAN)	
A. ZUHLKE and MICHELLE L.)	
ZUHLKE,)	
)	

Defendants.

Defendants, Derek A. Zuhlke, Kimberly A. Zuhlke, Dillan A. Zuhlke and Michelle L. Zuhlke (collectively “Defendants”), by and through their undersigned counsel, hereby submit pursuant to Fed. R. Bankr. P. 9006 this unopposed motion to extend their deadline to respond to Plaintiff’s *Complaint*. In support of this Motion, Defendants state as follows:

1. Plaintiff, Philip M. Kelly, Chapter 7 Trustee, initiated this action on July 29, 2024. (Filing No. 1).

2. Defendants have retained undersigned counsel to represent them in this matter. Defendants’ counsel is reviewing the allegations and requests an additional fourteen (14) days to prepare and draft a response to Plaintiff’s *Complaint*.

3. No party is prejudiced by the relief sought herein.

4. Defendants' counsel has conferred with Plaintiff's counsel, who does not oppose the relief sought herein.

WHEREFORE, Defendants, Derek A. Zuhlke, Kimberly A. Zuhlke, Dillan A. Zuhlke and Michelle L. Zuhlke, respectfully request that the Court enter an Order allowing them until and including September 11, 2024, to respond or otherwise plead to Plaintiff's *Complaint*, and for any other relief the Court deems appropriate.

DATED this 27th day of August, 2024.

DEREK A. ZUHLKE, KIMBERLY ZUHLKE,
DILLAN ZUHLKE AND MICHELLE ZUHLKE,
Defendants

By: /s/ Lauren R. Goodman
Lauren R. Goodman (#24645)
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of August, 2024, I filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties of record.

/s/ Lauren R. Goodman
Lauren R. Goodman